

**UNITED STATES DISTRICT COURT
DISTRICT OF MAINE**

JOINT MOTION TO EXTEND DISCOVERY AND REMAINING DEADLINES

Plaintiff Brian Thompson (“Thompson”) and Defendant Johnson Controls, Inc. (“JCI”), (collectively, the “Parties”), by and through their undersigned counsel, hereby jointly move to extend the remaining scheduling order deadlines in this case. Good cause exists to grant the relief requested herein pursuant to Fed. R. Civ. P. 6(b)(1)(A) for the following reasons:

1. Pursuant to ECF No. 31, and following a discovery conference, the Court extended discovery in the above-captioned case, setting a deadline of June 30, 2023 for the Parties to file a Joint Status Report.

2. In light of the Court's indefinite extension of the discovery deadline pending review of the Parties' Joint Status Report, the Parties now request that the Court cancel the Final Pre-Trial Conference scheduled for June 8, 2023, remove this matter from the July trial docket, and stay all remaining deadlines, pending review of the Joint Status Report.

WHEREFORE, the Parties jointly request that the Court grant their motion to extend discovery and stay the remaining deadlines as set forth herein.

Respectfully submitted,

Dated: June 7, 2023

/s/ Laura H. White

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Dated: June 7, 2023

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CERTIFICATE OF SERVICE

I, Aimee B. Parsons, hereby certify that on this 7th day of June, 2023, I filed the foregoing Joint Motion to Extend Discovery and Remaining Deadlines with the Court's CM/ECF system, which automatically sends notification to all counsel of record.

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/s/ Aimee B. Parsons
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